

1 ROBERT W. FREEMAN
Nevada Bar No. 3062
2 E-Mail: Robert.Freeman@lewisbrisbois.com
CHERYL A. GRAMES
3 Nevada Bar No. 12752
E-Mail: Cheryl.Grames@lewisbrisbois.com
4 LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
5 Las Vegas, Nevada 89118
702.893.3383
6 FAX: 702.893.3789
Attorneys for Defendant State Farm Mutual
7 *Automobile Insurance Company*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

10 ***

11 ROSE DESIO,

12 Plaintiff,

14 vs.

15 STATE FARM MUTUAL AUTOMOBILE
16 INSURANCE COMPANY; DOES I-V and
17 ROES VI-X, inclusive

18 Defendants.

CASE NO. 2:20-cv-1486-APG-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
RESPONSE TO PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT THAT
STATE FARM MUST AFFORD MS.
DESIO \$100,000/\$300,000 UIM
COVERAGE FOR THE AUGUST 23, 2019
MOTOR VEHICLE ACCIDENT (ECF No.
49)**

SECOND REQUEST

19
20 DEFENDANT STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY
21 ("Defendant"), by and through its counsel of record, the law firm of LEWIS BRISBOIS
22 BISGAARD & SMITH LLP, and PLAINTIFF ROSE DESIO ("Plaintiff"), by and through her
23 counsel of record, JESSE SBAIH & ASSOCIATES, LTD., hereby stipulate and agree that the time
24 for Defendant to file its Response to Plaintiff's Motion for Summary Judgment That State Farm
25 Must Afford Ms. Desio \$100,000/\$300,000 UIM Coverage for the August 23, 2019 Motor Vehicle
26 Accident (ECF No. 49) be extended as set forth herein. Defendant State Farm's Response thereto
27 is currently due May 24, 2021. The parties hereby stipulate that the deadline to file Defendant's
28 Response be extended to and including **May 26, 2021**. The parties further stipulate that the deadline

1 to file Plaintiff's Reply in support of her Motion for Summary Judgment That State Farm Must
2 Afford Ms. Desio \$100,000/\$300,000 UIM Coverage for the August 23, 2019 Motor Vehicle
3 Accident (ECF No. 49) is **June 18, 2021**.

4 **Reason for Extension**

5 Defendant requires additional time to address effectively Plaintiff's arguments in the instant
6 Motion prior to filing its Response, and Plaintiff anticipates a need for additional time to complete
7 her Reply. This stipulation is made in good faith and not for the purpose of delay.

8 This is the second extension of time requested for filing Defendant's Response to Plaintiff's
9 Motion for Summary Judgment That State Farm must Afford Ms. Desio \$100,000/\$300,000 UIM
10 Coverage for the August 23, 2019 Motor Vehicle Accident.

11 DATED this 24th day of May, 2021.

DATED this 24th day of May, 2021.

12 LEWIS BRISBOIS BISGAARD & SMITH LLP

JESSE SBAIH & ASSOCIATES, LTD.

13 /s/ Cheryl A. Grames

/s/ Jesse M. Sbaih

14 ROBERT W. FREEMAN

JESSE M. SBAIH

Nevada Bar No. 3062

Nevada Bar No. 7898

15 CHERYL A. GRAMES

INES OLEVIC-SALEH

Nevada Bar No. 12752

Nevada Bar No. 11431

16 6385 S. Rainbow Boulevard, Suite 600

The District at Green Valley Ranch

Las Vegas, Nevada 89118

170 South Green Valley Parkway, Suite 280

17 *Attorneys for Defendant*

Henderson, Nevada 89012

Attorneys for Plaintiff

18
19 **ORDER**

20 IT IS SO ORDERED.

21 Dated this 25th day of May, 2021.

22
23 
24 U.S. DISTRICT COURT JUDGE